

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re: )  
 ) Case No. 08-35653-KRH  
CIRCUIT CITY STORES, INC., et al., ) Jointly Administered  
 ) Chapter 11  
Debtors. ) Hon. Kevin R. Huennekens  
 )

**MOTION FOR LEAVE OF COURT TO ATTEND HEARING BY TELEPHONE**

The wholly-owned subsidiaries of Verizon Communications, Inc.<sup>1</sup> (“Verizon”) creditors in the above-captioned chapter 11 cases, by and through their undersigned counsel, and pursuant to the Court’s Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management, and Administrative Procedures, hereby moves for leave of Court to attend the February 13, 2009 hearing by telephone. In support thereof, Verizon states as follows:

1. On November 10, 2008 (the “Petition Date”), the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed voluntary petitions in this Court for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

2. On January 9, 2009, the Debtors filed a motion titled “Debtors’ Motion for Order Pursuant to Bankruptcy Code Section 105 and Bankruptcy Rule 9019 Approving Agreement Between Debtors and Verizon Corporate Services Group, Inc.” (the “Motion”) (Docket No. 1452) in order to obtain this Court’s approval of a settlement between the Debtors and Verizon.

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<sup>1</sup> The wholly-owned subsidiaries of Verizon Communications, Inc. include, without limitation, Verizon Corporate Services Group, Inc., Verizon Network Integration Corp., Verizon Business Global LLC, Verizon Business Network Services, Inc., Verizon Select Services, Inc., MCI Communications Services, Inc. f/k/a MCI WorldCom Communications, Inc. and the operating telephone company subsidiaries of Verizon Communications, Inc.

3. A hearing on the Motion was originally scheduled in the matter for January 29, 2009.

4. Due to issues raised by another creditor's application for payment of purported administrative expense, the January 29, 2009 hearing on the Motion was adjourned to the February 13, 2009 omnibus hearing date to allow the Debtors to reconsider and/or confirm certain issues related to the settlement set forth in the Motion.

5. Verizon's lead counsel, Darryl S. Laddin and Frank N. White, have been representing Verizon in its negotiations with the Debtors and have a unique and complete understanding of the facts and circumstances related to the issues presented in the Motion.

6. On November 13, 2008, the Court entered an Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management, and Administrative Procedures (the "Order"). On page 5 of Exhibit A, the Order states:

(g) Upon request, the Court may allow counsel to listen to a hearing by telephone. If a matter is contested, counsel must attend in person, unless leave of the court is granted on a case by case basis.

7. Mr. Laddin and Mr. White will not be able to appear in person on February 13, 2009 due to prior commitments, and Verizon respectfully asks for leave of Court pursuant to the Order so that one of them may appear and participate by telephone with Virginia counsel present in the courtroom.

8. Based on Mr. Laddin's and Mr. White's unique knowledge of the facts and legal arguments in this case, the ends of justice would be served by allowing Mr. Laddin and Mr. White to appear by telephone.

9. Motions to Appear Pro Hac Vice have also been filed on behalf of Mr. Laddin and Mr. White in this case. As of the date and time of this filing, Orders granting these Motions have not yet been entered.

WHEREFORE, Verizon respectfully requests that this Court grant this motion and enter an Order substantially in the form annexed hereto permitting Darryl S. Laddin and Frank N. White to appear and be heard by telephone at the hearing on February 13, 2009 on behalf of Verizon and granting such other relief as necessary and appropriate.

The wholly-owned subsidiaries of  
VERIZON COMMUNICATIONS, INC.

By: /s/ Jennifer J. West  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid or electronic means on this the 10th day of February, 2009 to the following constituting all necessary parties:

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